

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
U.S Department of the Interior, Bureau of Land Management

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**A. Background**

**BLM Office:** Prineville

**NEPA Log #:** DOI-BLM-ORWA-P040-2015-0001-DNA

**Project/Lease/Serial/Case File #:** N/A

**Location:** The burned area is located in Grant County near the eastern Oregon towns of Dayville to the North and Izee to the South.

**Proposed Action Title:** South Fork Complex Fence Reconstruction

**Description of the Proposed Action and any applicable mitigation measures:**

The proposal is to reconstruct or repair 45 miles of 4-wire fence that was damaged by the 2014 South Fork Complex Fire. Of these 45 miles, 5 miles would need major reconstruction and 38 miles would need minor repairs. To improve grazing management and protect other key resources, one mile of fence would be removed, and two miles of fence would be relocated/reconstructed. Repair is necessary to continue successfully implementing the grazing rotations on the impacted allotments as well as protect the following resources: Aldrich Mountain Wilderness Study Area (WSA), S. Fork John Day Wild and Scenic River, Middle Columbia River Steelhead Critical Habitat, and the Murderer's Creek Wild Horse Management Area. The project proposes to reconstruct fences along the boundary of Aldrich Mountain WSA, but does not include any fences within the WSA itself. There are no lands with wilderness characteristics within the project area.

Fence repair and/or replacement are critical during the years following a wildfire in order to properly manage rangeland and protect recovery of native vegetation and seedings from livestock grazing.

The burned fences would be surveyed to determine exactly how much would need to be repaired. In order to mitigate any wildlife concerns, fences would be constructed to facilitate big game movement or to incorporate other wildlife needs. The majority of the existing fence that burned was comprised of wooden posts, wooden H-braces, stays, and rock cribs.

The proposed action includes constructing/reconstructing approximately seven miles of fence repair that bisect potential sensitive plant species habitat (*Astragalus diaphanus* var. *diurnus* or ASDID) along the western boundary of the South Fork Fire burn perimeter. Mitigations and Best Management Practices (BMPs) are listed below.

The proposed action was considered in the 2006 District Fence EA (see section C below), and would include the same stipulations adopted in the Decision Record for that EA, as follows:

### **Soil/Vegetation/Watershed**

1. Contractors or other project entities would be given a noxious weed information pamphlet; be required to ensure their vehicle and equipment were checked for weed matter prior to entering the project area; and requested to report any weed discoveries in their work areas. Any weed sighting information would be forwarded to the District Noxious Weed Coordinator for follow-up action.
2. Surface disturbance would be held to a minimum and be rehabilitated to blend with surrounding soil surfaces. Emphasis would be placed on avoiding repeated entry of vehicles or equipment on sites where this activity previously occurred.
3. Work activities would be scheduled to minimize compaction and rutting to road surfaces.
4. Neither old growth juniper trees nor any other species of tree showing obvious signs of wildlife occupation would be felled.
5. Natural materials (such as vegetative matter from fence line clearing work) would be applied to new vehicle tracks and other vehicle/equipment activity areas.
6. Neither bulldozer nor other heavy equipment use would be allowed.
7. Contract vehicles shall be washed to remove all foreign weed seed prior to entering the project area.
8. If fence building occurs in the fall, there should be no risk of damage to potential ASDID populations. However, to be sure that no damage is incurred by motor vehicles, pictures of typical ASDID habitat will be provided to the fence repair crew and they will be asked to avoid driving over habitat that looks like it could contain ASDID during the growing season.
9. Potential Sections with potential for ASDID: T14S, R26E: S13, S23, S25, S26 or S31  
T15S, R26E: S13, S12 or S01;  
T15S, R27E: S31, SW corner of S07 and NW corner of S18; 19 or 20  
T16S R27E: S06

### **Fish and Wildlife**

1. Should the fish or wildlife situation change (such as new species found to be present or the status of a species changes), additional operational restrictions might be applied.
2. A BLM Wildlife Biologist would be notified if ferruginous hawks, or goshawk nests or individual birds, are discovered prior to or during fencing project. The biologist would determine appropriate protection measures; treatment activities would be adjusted accordingly.
3. For activities within one mile of eagle nests (during critical reproductive periods), seasonal operating restrictions would be in place between February 1 and August 31 (map provided).
4. Avoid fence repair or reconstruction activities within ¼ mile of golden eagle nests between the dates of February 1 and August 31.
5. Avoid fence repair or reconstruction activities in critical deer and elk winter range between the dates of: December 1 and April 15.

6. Mitigation: Elk, mule deer, and pronghorn fence guidelines for the BLM. In order to minimize the slope effect on fence clearance, the height of the top wire strand should be 38” from the soil surface and the bottom wire strand 18”. The second wire strand from the top should be 12” below the top wire strand (26”) so that deer are less susceptible to getting hung up in the fence. The third wire strand should be placed at 22” from the soil surface. The bottom strand should consist of smooth wire.

### **Cultural Resources**

1. Cultural resource inventory methods would be in accordance with OR BLM/SHPO (State Historic Preservation Office) standards and protocols.
2. All observed and recorded cultural resources, determined to be at risk from project activities, would be protected from damage or disturbance.
3. The following language or clause with similar language will be added to the Fence Contract: “In the event an archaeological object or site (prehistoric or historic) is encountered during project implementation, all ground disturbance at the location would stop until the BLM archaeologist is contacted to evaluate the discovery. Work would resume after the assessment is finalized.”

### **Recreation/Visuals Management**

1. In visually sensitive areas, efforts would be made to blend the fence in with the surrounding environment. Examples of potential actions include the following:
  - Use of gray or brown fence posts
  - Routing fences behind visual obstacles (such as trees or shrubs), or in front of topographic features, such as rock cliffs or outcroppings.
  - Placement of braces or other fence components away from topographic crests (such as ridgelines and/or rimrocks).
  - No motorized vehicle access is allowed off of designated routes and no mechanized equipment allowed within the Aldrich Mt. WSA.

## **B. Land Use Plan Conformance**

**Land Use Plan Name:** John Day Basin RMP

**Date approved (ROD):** April, 2015

Livestock Grazing

Objective L2

Maintain forage production and livestock use levels at sufficient to provide.... To protect non-market values. Pg 86

Livestock Grazing, Wild Horses, Wild Ungulates Fence construction may involve use of all-terrain vehicles, flatbed trucks, and both manual and power tools... pg. 172.

## **C. Identify applicable National Environmental Policy Act (NEPA) documents and related documents that cover the proposed action**

**The following NEPA documents (EA, DEIS, FEIS) cover the proposed action:**

Environmental Assessment (EA) DOI-BLM-OR-P000-2006-0067-EA Removal, Replacement, Reconstruction of Existing Fences – Prepared Oct. 2, 2006 (“District Fence EA”) (Decision Record signed Feb. 1, 2007)

## **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Yes, the proposed action is the same as the proposed action in the District Fence EA. The proposed action (p. 2 of the District Fence EA) included reconstruction and removal of existing fences. In addition, the Proposed Action included moving the replacement fence if an old fence is located along a circuitous route and building the new fence on a more direct route could reduce the net mileage (and cost); or an existing fence does not follow land ownership or allotment boundaries. By building the replacement fence consistent with recognized boundaries, potential land tenure issues could be resolved (p. 4 of the District Fence EA). The proposed action is located within the same geographic area previously analyzed in the listed NEPA documents and specifically, the proposed action is along a similar route of the old allotment boundary fence.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?**

Yes, the District Fence EA addressed the appropriate range of alternatives given the current proposed action, and current environmental concerns, interests, and resource values. The District Fence EA included a No Action and a range of Proposed Actions including removal, reconstruction and replacement of existing fence (p. 2-4 of District Fence EA).

**3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, and updated lists of BLM sensitive species)? Can you reasonably conclude that all new information and new circumstances would not substantially change the analysis of the new proposed action?**

The only new information is a sensitive plant species, *Astragalus diaphanus* var. *diurnus* (ASDID) that is known to occur within the vicinity of the project area. No known ASDID populations occur within the project area. The District Fence EA did not specifically analyze this potential sensitive plant species habitat. However, it did provide direction on mitigations for surface disturbance activities that also mitigate the concerns for the sensitive plant species. (p.5 of District Fence EA).

Additionally, BMPs are being recommended to ensure effects do not exceed those anticipated in the EA and if implemented the proposed action will not cause damage to potential ASDID populations.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document(s)?**

Yes, the same effects that would result from the current proposed action were analyzed in the District Fence EA (p.6-10) under Soil/Vegetation/Watershed/Riparian/Water Quality/Wetland Areas, Fish and Wildlife, Special Management Areas (SMAs), Historic/Archaeological Resources, Fire and Fuels, Recreation, Visual Quality, Livestock Grazing and Human Safety. Cumulative effects of the new proposed action would be similar to those listed on page 10 of the District Fence EA.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Yes, the list of “interested publics” is updated on a regular basis and many of the individuals and organizations on the current “interested publics” list are the same as those on the mailing list for the planning and NEPA documents listed. A final copy of this DNA will be posted on the Prineville District’s internet page for public review. A printed copy of these documents will be available on request.

**E. BLM Staff consulted**

<u>Name</u>	<u>Title</u>
Emily Lent	ID Team Leader/Range
Theresa Holtzapple	Heritage Resources
Monte Kuk	Wildlife
Teal Purrington	NEPA
Kristin Williams	Botany
Justin Rodgers	Range
Jimmy Eisner	Fisheries
Heidi Mottl	Recreation/Visuals

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**Conclusion**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the documentation fully covers the proposed action and constitute BLM's compliance with the requirements of the NEPA.

**Signature**

Responsible official:

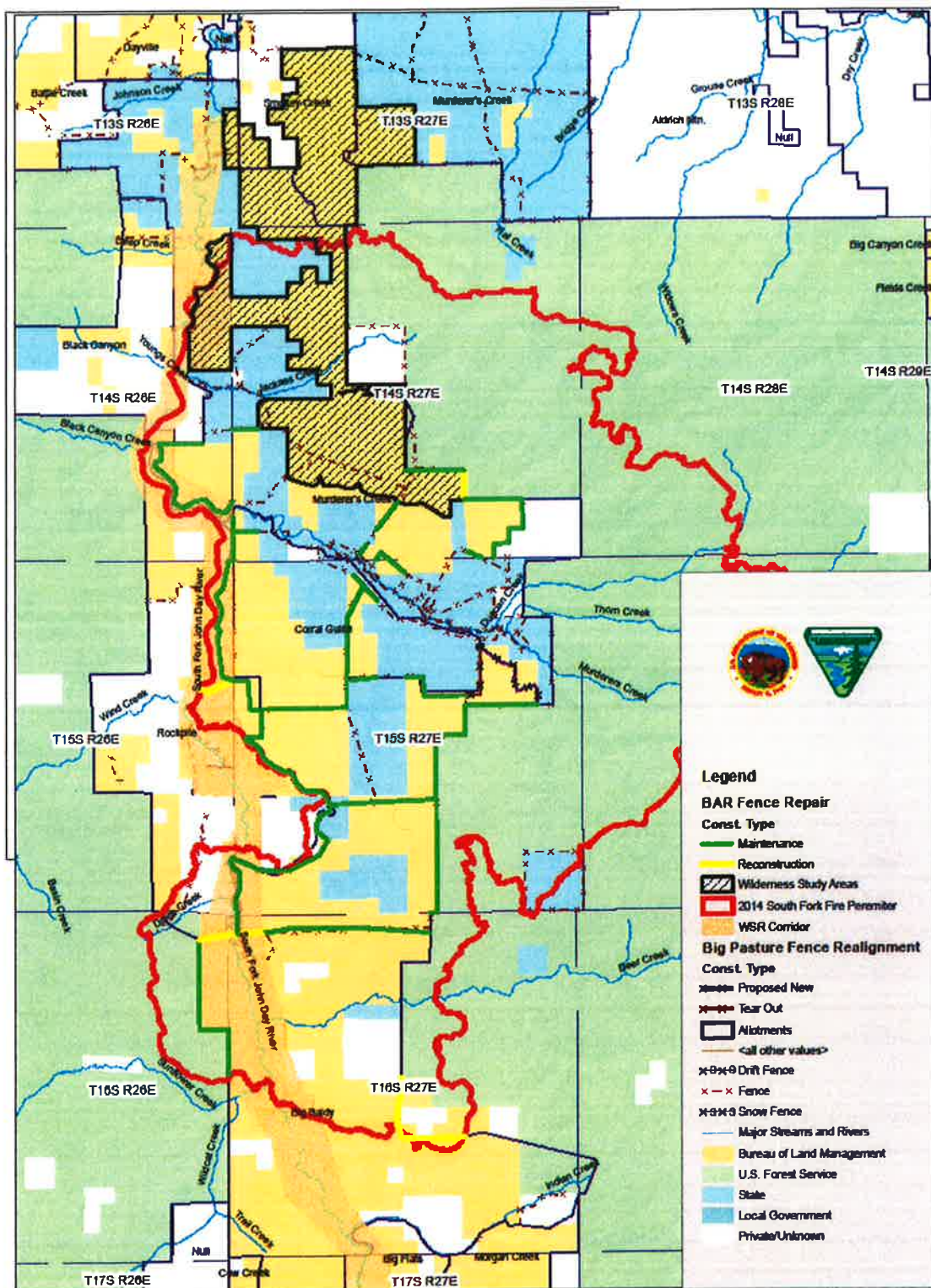
  
H.F. "Chip" Faver, Field Manager

10/1/15  
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. Since the current proposed action was already considered in an existing NEPA document, and the range of alternatives, effects analysis and public involvement remain valid, and the existing decision fully covers the current proposed action, the BLM is not issuing a new decision at this time. The proposed action will be completed pursuant to the 2009 Decision Record on the District Fence EA.

**Contact Person**

For additional information concerning this review, contact: Emily Lent, Team Leader, Prineville Field Office, 3050 NE 3rd Street, Prineville, OR 97754, telephone (541) 416-6789, [elent@blm.gov](mailto:elent@blm.gov).



## 2014 South Fork Complex Fire - BAR Fence Repair



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No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources and may be updated without notification.

NOT: Unchecked  
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